

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CAROLYN RAFAELIAN, an individual, :
ALEX AND ANI PLEDGE CO., a :
Rhode Island Corporation and :
VENICE BEACH WALK, LLC, :
a California Limited Liability Company, :
Plaintiffs, :

Vs. :

C.A. No. 1:20-cv-00247-MSM-PAS

LC A&A HOLDINGS, INC., a Delaware :
Corporation, LC A&A INTERMEDIATE :
INVESTORS, LLC, a Delaware limited :
liability company, :
LYNDON LEA, an individual, :
A and A SHAREHOLDING CO., LLC, :
a Delaware limited liability company, and :
ROBERT TRABUCCO, an individual, :
Defendants. :

STIPULATION

By agreement of the Parties:

1. Defendants may have up to and including November 6, 2020 in which to file their
Reply Brief in Support of Defendants' Motion to Dismiss.

2. The parties further stipulate to the dismissal of Counts IV (Conversion) and Count V
(Replevin) of the Amended Complaint without prejudice.

Plaintiffs,
Carolyn Rafealian, Alex & Ani Pledge Co.
and Venice Beach Walk, LLC,
By their Attorney,

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Defendants,
LC A&A Holdings, Inc., LC A&A
Intermediate Investors, LLC and Lyndon
Lea,
By their Attorneys,

/s/ Matthew T. Oliverio
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Defendants,
A and A Shareholding Co., LLC and Robert
Trabucco,
By their Attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2020, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Matthew T. Oliverio

